



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DAS  
F.#2009R02161

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 28, 2013

**By ECF and Hand Delivery**

The Honorable I. Leo Glasser  
United States District  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Peter Liounis  
Criminal Docket No. 12-CR-350 (ILG)

Dear Judge Glasser:

On August 13, 2013, after the Court denied the defendant's pretrial motions, the parties represented to the Court that they were engaged in plea negotiations which were likely to resolve the case without a need for trial. The Court therefore set a date of September 23, 2013 for a status conference or guilty plea, and noted that, if the defendant had not pled guilty by that date, the Court would set a trial date shortly thereafter.

Michael Gold, stand by counsel for the defendant, recently informed the government that the defendant does not wish to plead guilty, and instead has elected to proceed to trial. The government therefore respectfully requests that the Court set a trial date at this time.

As the government noted at the previous status conference, much of the government's evidence will be elicited through the testimony of victims of the defendant's fraudulent scheme. These victims, most of whom are elderly, are all located outside of the New York area, and significant advanced notice will be necessary to permit these victims to travel to New York to testify. The government therefore respectfully requests that the Court schedule a trial date for November 3, 2013 or thereafter, which will provide the victims sufficient time to make plans to travel to New York for the trial.

The Court previously entered an order of excludable delay until September 23, 2013. Because this case has been designated as a complex case, the government respectfully

requests that the Court enter an order of excludable delay from September 23, 2013 until the trial date, pursuant to 18 U.S.C. §§ (7)(A) and (7)(B)(ii).

Respectfully submitted,

LORETTA E. LYNCH  
UNITED STATES ATTORNEY

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Clerk of the Court (via ECF)